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3 Jin Zhang (SBN: 243880)

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5 FINNEGAN, HENDERSON, FARABOW,

6 GARRETT & DUNNER, L.L.P.

7 3300 Hillview Avenue

8 Palo Alto, California 94304

9 Telephone: (650) 849-6600

10 Facsimile: (650) 849-6666

11 Christopher P. Foley (not yet admitted *pro hac vice*)

12 christopher.foley@finnegan.com

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14 kenneth.leichter@finnegan.com

15 FINNEGAN, HENDERSON, FARABOW,

16 GARRETT & DUNNER, L.L.P.

17 901 New York Avenue, NW

18 Washington, DC 20001-4413

19 Telephone: (202) 408-4000

20 Facsimile: (202) 408-4400

21 Attorneys for Defendant

22 CHINA & ASIA TRAVEL SERVICE, INC.,

23 D/B/A CHINA INTERNATIONAL TRAVEL

24 SERVICE (USA)

25 UNITED STATES DISTRICT COURT

26 NORTHERN DISTRICT OF CALIFORNIA

27 SAN FRANCISCO DIVISION

28 CHINA INTL TRAVEL SERVICES (USA),
INC.,

Plaintiff,

v.

CHINA & ASIA TRAVEL SERVICE, INC.,
D/B/A CHINA INTERNATIONAL TRAVEL
SERVICE (USA), and DOES 1-10, inclusive,

Defendants.

CASE NO. 08-cv-01293 (MEJ)

**DECLARATION OF FRANK LI IN
SUPPORT OF DEFENDANT'S
MOTION TO DISMISS OR, IN THE
ALTERNATIVE, FOR SUMMARY
JUDGMENT ON ALL COUNTS OF
PLAINTIFF'S COMPLAINT**

1
2 I, FRANK LI, declare as follows:

3 1. I am a resident and citizen of the state of California;

4 2. I am the President of Defendant China & Asia Travel Service, Inc., d/b/a China
5 International Travel Service (USA)'s ("Defendant"). I have been employed by Defendant for 16
6 years. I make this Declaration in support of Defendant's Motion to Dismiss or, In the Alternative,
7 for Summary Judgment. I have personal knowledge of the facts stated therein and if called as a
8 witness, could and would competently testify thereto.
9

10 3. Defendant began doing business as "China International Travel Service Headquarters
11 (USA)" in 1992. In 1997 this usage changed simply to "China International Travel Service (USA)".
12 Defendant has used the CITS USA name consistently since at least as early as 1997. Attached
13 hereto as Exhibit A is a true and correct copy of Defendant's California fictitious name registration
14 for the name "China International Travel Service Headquarters (USA)", dated August 5, 1992.
15 Attached hereto as Exhibit B is a true and correct copy of Defendant's California fictitious name
16 registration for the name "China International Travel Service (USA)", dated July 18, 1997, renewed
17 on May 16, 2002 and March 23, 2007 respectively.
18

19 4. Defendant has used the CITS GLOBE DESIGN on its letterhead continuously since
20 1992. Attached hereto as Exhibit C is a true and correct copy of a letter dated March 20, 1992, from
21 Jianhua Zhang, Defendant's then-President, to the Airline Reporting Corporation.
22

23 5. Attached hereto as Exhibit D is a true and correct copy of a cease-and-desist letter
24 sent by Defendant to Grand Pacific Tours Int'l Co. dated June 5, 1992 and a response from Grand
25 Pacific to Defendant dated June 15, 1992.

26 6. Attached hereto as Exhibit E is a true and correct copy of a letter dated May 17, 1993,
27 from Jianhua Zhang, Defendant's then-President, to the Airline Reporting Corporation.
28

1 7. Attached hereto as Exhibit F is a true and correct copy of an advertisement Defendant
2 placed in the New York Times in 1993.

3 8. Defendant has been a member of the Airline Reporting Corporation since 1993.
4 Attached hereto as Exhibit G is a true and correct copy of a letter from ARC dated July 22, 1993,
5 reflecting Defendant's membership in that organization.
6

7 9. Defendant has been a member of the International Airlines Travel Agent Network
8 since 1994. Attached hereto as Exhibit H is a true and correct copy of a letter from IATAN dated
9 May 13, 1994, reflecting Defendant's membership in that organization.

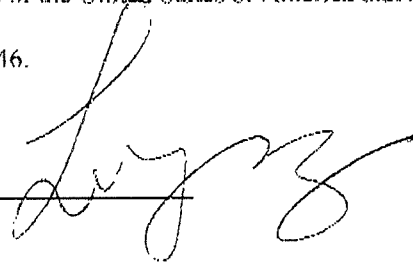
10 10. Defendant has been a member of the United States Tour Operators Association since
11 1999. Attached hereto as Exhibit I is a true and correct copy of a letter from USTOA dated January
12 18, 1999, reflecting Defendant's membership in that organization.

13 11. Defendant has been a preferred visa services provider for The Consulate General of
14 The People's Republic of China in Los Angeles since 1993. Attached hereto as Exhibit J is a true
15 and correct copy a letter from The Consulate General of The People's Republic of China in Los
16 Angeles dated May 1, 1993 reflecting that status.
17
18

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct pursuant to 28 U.S.C. § 1746.
21

22
23 Dated: March 31, 2008

24
25
26
27
28
Frank Li



DISCLARATION OF FRANK LI

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT A

PLEASE PRINT OR TYPE SEE REVERSE FOR INSTRUCTIONS

A. MAIL FILED DOCUMENTS TO: NAME RICHARD K. QUINN, ESQ. ADDRESS 1100 Wilshire Blvd., Ste. 2800 CITY L.A. STATE CA ZIP 90017 PHONE 213/481-2888 <input checked="" type="checkbox"/> First Filing <input type="checkbox"/> Renewal Filing Current Registration No. _____	B. PUBLISH IN NEWSPAPER: COUNTY CLERK'S FILING STAMP <div style="text-align: center; border: 2px solid black; padding: 5px;"> FILED LOS ANGELES COUNTY CLERK AUG 05 1992 CHARLES WEISSBURD, COUNTY CLERK <i>H. Morales</i> BY G. MORALES, DEPUTY </div>
FICTITIOUS BUSINESS NAME(S) THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS:	
1. Fictitious Business Name(s) CHINA INTERNATIONAL TRAVEL SERVICE HEADQUARTERS (U.S.)	
2. Street Address, City & State of Principal Place of Business in California 975 East Green Street, Suite 101, Pasadena, CA 91106	
3. Full name of Registrant (If corporation - show state of incorporation) CHINA & ASIA TRAVEL SERVICE, INC. - CALIFORNIA	
Residence Address 975 East Green Street, Suite 101, Pasadena, CA 91106	
Full name of Registrant (If corporation - show state of incorporation) _____	
Residence Address _____	
Full name of Registrant (If corporation - show state of incorporation) _____	
Residence Address _____	
4. This Business is conducted by: <input type="checkbox"/> an individual <input type="checkbox"/> a general partnership <input type="checkbox"/> joint venture <input type="checkbox"/> a business trust <input type="checkbox"/> co-partners <input type="checkbox"/> husband and wife <input type="checkbox"/> a corporation <input type="checkbox"/> a limited partnership <input type="checkbox"/> an unincorporated association other than a partnership <input type="checkbox"/> other please specify _____	
5. <input checked="" type="checkbox"/> Do not leave blank The registrant commenced to transact business under the fictitious name or names listed above on 8/15/92	
6A. Signed _____ Signed _____ Type or Print Name(s) _____	6B. If Registrant is a corporation sign below: Corporation Name CHINA & ASIA TRAVEL SERVICE, INC. Signature & Title <i>Zhang Jianhua, President</i> Type or Print Officer's Name & Title JIANHUA ZHANG, President
7. This statement was filed with the County Clerk of _____ County on (date indicated by file stamp above.)	
NOTICE - THIS FICTITIOUS BUSINESS NAME STATEMENT EXPIRES FIVE (5) YEARS FROM THE DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW STATEMENT MUST BE FILED BEFORE THAT TIME. THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14400 ET SEQ., BUSINESS AND PROFESSIONS CODE).	
I HEREBY CERTIFY THAT THIS COPY IS A CORRECT COPY OF THE ORIGINAL STATEMENT ON FILE IN MY OFFICE <div style="text-align: center;"> CHARLES WEISSBURD COUNTY CLERK BY <i>[Signature]</i> DEPUTY FILE NO. 92163373 </div>	

California Newspaper Service Bureau, Inc.
 A Daily Journal Company

San Diego (619) 232-0408 Fax 232-1169	Oakland (415) 465-3121 Fax 465-1378	Santa Ana (714) 972-3872 Fax 940-6841	San Jose (408) 287-4866 Fax 287-2644	Los Angeles (213) 239-6500 Fax 225-0532	Santa Rosa (707) 545-1188 Fax 545-6310	Sacramento (916) 444-3950 Fax 444-3811	San Rafael (415) 478-4311 Fax 478-2114	San Francisco (415) 255-7767 Fax 255-7707
---	---	---	--	---	--	--	--	---

For Bank and other required needs (Certified)

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT B

RECEIVED MAY 6 2002

<p>A</p> <p style="text-align: right; font-size: small;">Fiduciary 4/12/2002 C/N</p> <p>File #971087388 expires 7/18/02 or 40 days after business changes.</p> <p>CHINA INTERNATIONAL TRAVEL SERVICE (USA) C/o China And Asia Travel Service Inc - Feng Li 975 E GREEN ST STE 101 PASADENA CA 91106-2415</p> <p>1 <input type="checkbox"/> First filing <input checked="" type="checkbox"/> Renewal filing</p>	<p style="text-align: center;">REGISTRAR-RECORDER/COUNTY CLERK'S FILING STAMP</p> <p style="text-align: center; font-size: 24pt; font-weight: bold;">02 1131012</p>												
<p style="text-align: center;">FICTITIOUS BUSINESS NAME STATEMENT</p> <p style="text-align: center;">THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS: (Attach additional pages if required)</p>													
<p>2</p>	<p>Fictitious Business Name(s)</p> <p>1. CHINA INTERNATIONAL TRAVEL SERVICE (USA)</p> <p>2.</p> <p>3.</p> <p>Articles of Incorporation or Organization Number (if applicable) AI #/ON 1493464</p>												
<p>3</p>	<p>Street Address & City of Principal Place of Business in California (P.O. Box alone not acceptable)</p> <p>975 E GREEN ST STE 101 PASADENA CA 91106-2415</p>												
<p>4</p>	<p>Full name of Registrant (if corporation - incorporated in what state)</p> <p>CHINA AND ASIA TRAVEL SERVICE INC CA</p>												
<p>4A</p>	<p>Residence Street Address</p> <p>975 E GREEN STREET SUITE 101 PASADENA CA 91106</p>												
<p>4B</p>	<p>Full name of Registrant</p> <p>Residence Street Address</p>												
<p>5</p>	<p>This Business is conducted by: (check one only)</p> <p> <input type="checkbox"/> an individual <input type="checkbox"/> a general partnership <input type="checkbox"/> joint venture <input type="checkbox"/> a business trust <input type="checkbox"/> co-partners <input type="checkbox"/> husband and wife <input checked="" type="checkbox"/> a corporation <input type="checkbox"/> a limited partnership <input type="checkbox"/> an unincorporated association other than a partnership <input type="checkbox"/> a limited liability company </p>												
<p>6</p>	<p><input checked="" type="checkbox"/> The registrant commenced to transact business under the fictitious business name or names listed on (Date): 7/18/97 <input type="checkbox"/> Registrant has not yet begun to transact business under the fictitious business name or names listed herein.</p>												
<p>7 I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)</p>													
<p>8</p>	<p>Signature of Registrant(s)</p> <table style="width: 100%;"> <tr> <td style="width: 50%;">SIGNATURE</td> <td style="width: 50%;">TYPE OR PRINT NAME</td> </tr> <tr> <td style="height: 40px;"> </td> <td> </td> </tr> <tr> <td>SIGNATURE</td> <td>TYPE OR PRINT NAME</td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td>SIGNATURE</td> <td>TYPE OR PRINT NAME</td> </tr> <tr> <td> </td> <td> </td> </tr> </table>	SIGNATURE	TYPE OR PRINT NAME			SIGNATURE	TYPE OR PRINT NAME			SIGNATURE	TYPE OR PRINT NAME		
SIGNATURE	TYPE OR PRINT NAME												
SIGNATURE	TYPE OR PRINT NAME												
SIGNATURE	TYPE OR PRINT NAME												
<p>8A (If Registrant IS a CORPORATION or LLC, sign below:</p> <p style="text-align: center;">CHINA AND ASIA TRAVEL SERVICE INC</p> <p style="text-align: center;">Corporation or LLC Name</p> <p>X <i>[Signature]</i> Signature President Title</p> <p style="text-align: center;">FENG LI Type or Print Name</p>													
<p>This statement was filed with the County Clerk of LOS ANGELES county on date indicated by file stamp above.</p> <p>NOTICE - THIS FICTITIOUS BUSINESS NAME STATEMENT EXPIRES FIVE YEARS FROM DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE. The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state or common law (See Section 14400 et seq., Business and Professions Code)</p>													

LEGAL DESK™ - Fictitious Business Name Statements - AAD News
 Adjudicated in LA County Superior Court #NOC 9391 joycomod@pacbell.net
 3413 Soledad Cyn Rd - PO Box 57, Acton, California 93510-0057 (661) 269-1160
 County Business Names on file 1 800 605 7171 (Average call 3 min. first call \$5. extra min \$2)

Filing/Publishing Fee: \$10. for 1 FBN and 2 registrants
 plus \$2.00 for each additional FBN/registrant to
 LA County Clerk B. 547 Legal Desk - AAD News
 • CHANGES SEE BACK •

THIS FORM SHOULD BE TYPED OR
 PRINTED "LEGIBLY" IN BLACK INK.



2

PAID 3/15/2007
3/15-6474-69

A Current File Number.

File #21131012 EXPIRES ON 5/16/07
FBN statements expire 40 days after business address changes or 5 years after file date.

Mailing Address:

CHINA INTERNATIONAL TRAVEL SERVICE (USA)
C/o China And Asia Travel Service Inc - Feng U
975 E GREEN ST STE 101
PASADENA CA 91106-2415

REGISTRAR-RECORDER/COUNTY CLERK'S FILING STAMP

03/23/07



20070667485

1 ☐ First filing ☒ Renewal filing
Check one only**FICTITIOUS BUSINESS NAME STATEMENT**
THE FOLLOWING PERSON(S) IS (ARE) DOING BUSINESS AS: (Attach additional pages if required)

Fictitious Business Name(s)

2 1. CHINA INTERNATIONAL TRAVEL SERVICE (USA)

2.

3 Street Address/City/Zip of Principal Place of Business in California (P.O. Box alone not acceptable)

975 E GREEN ST STE 101

PASADENA

CA 91106-2415

4 Full name of Registrant (person or corporation/LLC)

CHINA AND ASIA TRAVEL SERVICE INC

(If corporation/LLC - incorporated in what state)

CA

Residence Street Address

975 E GREEN STREET SUITE 101

PASADENA

CA 91106

4A Full name of Registrant

Residence Street Address

4B Full name of Registrant

Residence Street Address

5 This Business is conducted by: (check one only)
() an individual () a general partnership () joint venture () a business trust
() co-partners () husband and wife (X) a corporation () a limited partnership
() an unincorporated association other than a partnership () a limited liability company () other6 (X) The registrant commenced to transact business under the fictitious business name or names listed on (Date): 5 / 16 / 02
() Registrant has not yet begun to transact business under the fictitious business name or names listed herein.

7 I declare that all information in this statement is true and correct. (A registrant who declares as true information which he or she knows to be false is guilty of a crime.)

8 Signature of Registrant(s) in black ink. If Corporation/LLC marked in #5, officer sign BA only.

BA If Registrant IS a CORPORATION or LLC, officer sign BA below in BLACK INK & return mail with filed Articles of Incorporation/Org copy.

CHINA AND ASIA TRAVEL SERVICE INC

Signature of LLC Name

Signature

President

FENG U

Type or Print Officer Name

Signature

Type or Print Name

Signature

Type or Print Name

Signature

Type or Print Name

This statement was filed with the County Clerk of LOS ANGELES county on date indicated by file stamp above.
NOTICE - THIS FICTITIOUS NAME STATEMENT EXPIRES FIVE YEARS FROM DATE IT WAS FILED IN THE OFFICE OF THE COUNTY CLERK. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE. The filing of this statement does not of itself authorize the use in this state of a fictitious business name in violation of the rights of another under federal, state or common law (See Section 14411 et seq., Business and Professions Code).
LEGAL DESK TM
www.legaldesk.net - find LA business names in use - NO CHARGE
Adjudicated in LA County Superior Court #NOC 9391
3413 Soledad Cyn Rd - PO Box 57, Acton, California 94510-0057.
- 861 269 1169 - joycedmedia.com - AAD NEWS - aadnews.com
Live help + Find LA County business names on file 1 800 505 7171 (Average call 3 min - but min \$5 - credit 1min \$2)PAY with two cks - Legal Desk \$89 - LA County Clerk \$15
SIGN & MAIL - ANY CHANGES see back & sample formLA clerk fee is \$18. - for 1 FBN & 2 registrants
plus \$4. for each additional FBN/registrantTHIS FORM SHOULD BE TYPED OR
PRINTED "LEGIBLY" IN BLACK INK.

MAILING ADDRESS: 3/15/2007 CR# 6474

Name: CHINA INTERNATIONAL TRAVEL SERVICE (USA)
 Address: 975 E GREEN ST STE 101
 City/State: PASADENA CA 91106-2415
 1

(New file number below is good for five years from new filed date)

NEWFILDA
TE 3/23/2007

☐ First Filing ☒ Renewal Filing

NEWFILNUM



-2-

Fictitious Business Name(s)
1- CHINA INTERNATIONAL TRAVEL SERVICE (USA)

(Street address of principal place of business in California)
975 E GREEN ST STE 101
PASADENA CA 91106-2415

CD65



0077

Dear Client:

Here is your personal copy of your Fictitious Business Name Statement (DBA-Doing Business Under An Assumed Name) RENEWAL FILING.

We have re-filed your Fictitious Business Name Statement with the LOS ANGELES REGISTRAR-RECORDER/COUNTY CLERK, as you requested us to do.

This filing is good for five years from the filing date- IF YOU DON'T CHANGE ANYTHING. After five years you must renew your Fictitious Business Name Statement if you plan to continue doing business using the same name within Los Angeles County. If you make any changes to ownership or address, during the next five years, you must refile and publish again within 45 days or your statement automatically expires.

At the beginning of 1993, the Los Angeles Registrar-Recorder/County Clerk began to file Fictitious Business Name Statements on microfilm. This means that within about 75 days the Clerk will return your original document to you after it has been recorded on microfilm. Put your original in a safe place. Your Fictitious Business Name Statement is now in the public record, on microfilm, at the Los Angeles Registrar-Recorder/County Clerk's office.

If you wish to abandon your business name you must file a Statement of Abandonment with the Los Angeles Registrar-Recorder County Clerk. We can do that for you too if you need it.

Thank you for choosing our newspaper to publish this legal information for you. We wish you five years of continued success in your business.

Please call us again if we can help you in the future.

LEGAL DESK - Acton Agua Dulce News

PS - Look up new or old business names to check refile status or before you file to avoid legal problems with business names already used - Call 1 900 505 7171.

---Live Operator. Computer search/lookup average call \$7, (\$6 first min. + \$2 each extra in.)

THIS STATEMENT WAS FILED WITH THE COUNTY CLERK OF LOS ANGELES COUNTY ON DATE INDICATED BY FILE STAMP TOP RIGHT.
 NOTICE: THIS FICTITIOUS NAME STATEMENT EXPIRES 5 YEARS FROM THE DATE IT WAS FILED AS SHOWN ABOVE IN #5 OF TOP RIGHT. A NEW FICTITIOUS BUSINESS NAME STATEMENT MUST BE FILED PRIOR TO THAT DATE. THE FILING OF THIS STATEMENT DOES NOT OF ITSELF AUTHORIZE THE USE IN THIS STATE OF A FICTITIOUS BUSINESS NAME IN VIOLATION OF THE RIGHTS OF ANOTHER UNDER FEDERAL, STATE, OR COMMON LAW (SEE SECTION 14400 ET SEQ. BUSINESS AND PROFESSIONS CODE). 4:43:31 PM, 3/29/2007

Legal Desk - Fictitious Business Name Statements
 * NAME SEARCH/Answer Phone 1-900-505-7171
 (Adjudicated in LA COUNTY Superior Court #NOC 9331)
 3415 Santiago Rd. - Bureau Desk #21 - G.Y.M.
 ACTON/AGUA DULCE NEWS (661-268-1189)
 PO Box 97 - ACTON, CA 93510-0097

* CALL 1 900 505 7171 LOOK UP BUSINESS NAMES BEFORE YOU FILE - AVOID LEGAL PROBLEMS WITH NAMES IN USE
 Lost your file number? Forgot your expire date? - (\$6 first min. + extra min \$2)
 Live operator on waiting - 7 names per call - COMPUTER SEARCH/LOOK UP

Notice prepared on

3/29/2007

51407



China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
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EXHIBIT C



CHINA & ASIA TRAVEL SERVICE, INC.
A Subsidiary of China International Travel Service Headquarters

March 20, 1992

ARC
New Applications Department
1709 New York Avenue, NW
Washington D.C. 20006

Dear Sirs:

China & Asia Travel Service, Inc. is the subsidiary of China International Travel Service Headquarters (CITS) which is the largest state-owned tourist company founded in 1954 in China. My Company is legally registered in the state of California and has been doing business for the last two years in the city of Pasadena, California. We sell tour products to China, Japan, Thailand and other south-eastern Asia countries. We also do visa handling for those tourists to the abovementioned countries. We intend to join ARC as we would like to expand our business by selling air tickets for various airlines. I would greatly appreciate your sending me the information material on membership qualification and application form etc.. Please do not hesitate to contact me if you need more information on my Company. The mailing address and phone, fax numbers are as follows:

China & Asia Travel Service, Inc.
975 E. Green Street, Suite 101
Pasadena, CA. 91106

phone: 818-568-8993
fax ; 818-568-9207

I am looking forward to hearing from you.

Respectfully yours,

Zhang Jianhua
Jianhua Zhang

President, China & Asia Travel Service, Inc.

China Intl Travel Services (USA), Inc.

v.

China & Asia Travel Service, Inc, et al.

Case No. 08-cv-01293

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EXHIBIT D

CITS USA

626 666 8207

10/19/07 11:56am P. 029

JUN 05 '92 16:49 QUAN, COHEN ET AL

P.2

QUAN, COHEN, KURAHASHI, HSIEM & SCHOLTZ
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

RICHARD K. QUAN
KENNETH P. SCHOLTZ
ARTHUR D. COHEN
MILEEN KURAHASHI
RICHARD W. HSIEM
RICHARD A. YANG
RONALD M. HIRANO
GLAINE J. FONG

1100 WILSHIRE BOULEVARD, SUITE 2000
LOS ANGELES, CALIFORNIA 90017-1016
TELEPHONE (213) 461-2800

FACSIMILE (213) 461-2800
OF COUNSEL
MARION C. FAY

June 5, 1992

IN REPLY REFER TO:

No. 9887

Grand Pacific Tours Int'l Co.
3030 Gainsborough Drive
Pasadena, California 91107

Re: Unlawful Use of Name and Logo

Dear Sir or Madam:

This office represents China International Travel Service ("CITS"), a corporation organized and existing under the laws of the Peoples Republic of China and China National Tourism Administration, a California corporation.

It has recently been brought to our clients' attention that you are using the logo and name of CITS in connection with your business without the authorization of China International Travel Service. You have also unlawfully incorporated a significant part of the logo of China National Tourism Administration into your logo.

Our clients inform us that you have not been authorized to hold yourself out as having any affiliation whatsoever with either the China International Travel Service or the China National Tourism Administration.

On behalf of our clients we demand that you immediately cease and desist from:

1. Representing that you are the CITS overseas office;
2. Using the CITS logo in connection with your business, stationery or other materials;
3. Incorporating and using the China International Tourism Administration logo in connection with your business, stationery or other materials;

CITS USA

625 568 9207

10/19/07 11:28am P. 004

JUN 05 '92 16:49 QUAN, COHEN ET AL

P.3

Grand Pacific Tours Int'l, Co.
June 5, 1992
Page 2

4. **Holding yourself out to the public as being affiliated with either the China International Travel Service or the China National Tourism Administration.**

Unless you immediately halt your unlawful practices, we have been instructed to initial legal action to enjoin your unlawful conduct and seek damages against you as permitted under the laws of the State of California and the United States.

You are advised to act accordingly.

Very truly yours

**QUAN, COHEN, KURAHASHI, HSIEH
& SCHOLTZ
A Professional Corporation**

RICHARD K. QUAN

RKQ/cn

**cc: China International Travel Service
China National Tourism Administration**

CITS USA

626 588 9207

10/19/07 11:58am P. 008

Grand Pacific International Co.

Jun 15, 1992

QUAN, COHEN, KURAHASHI, HSIEN & SCHOLTZ
PROFESSIONAL CORPORATION
ATTORNEY AT LAW
1100 WILSHIRE BOULEVARD, SUITE 2900
LOS ANGELES, CALIFORNIA 90017-1916
MR. RICHARD K. QUAN

Dear Mr. Quan

Regarding your letter of Unlawful Use of Name and Logo, we ceased to use the Name and Logo of C.I.T.S and C.N.T.A. starting from Jun 15, 1992. The new stationary with the correction will be sent to you in two weeks as proof, if you have any questions, please do not hesitate to contact me at (818) 585-1888 or Fax (818) 793-9546.

Sincerely yours

James Shao


Sales director
JS/gz

3030 Gainsborough Dr. Pasadena, CA 91107, U. S. A. Tel:(818)585-1888 Fax:(818)793-9546

China Intl Travel Services (USA), Inc.
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EXHIBIT E



CHINA & ASIA TRAVEL SERVICE, INC.
A Subsidiary of China International Travel Service Headquarters

May 17, 1993

Agency Accreditation Service
Airlines Reporting Corporation
1709 New York Avenue, N.W.
Washington, D.C. 20006-5288

Dear Sir or Madam,

We are submitting all the documents to you for your approval as a member of Airline Reporting Corporation. Enclosed please kindly find the following attachments:

01. The original letter of ARC with control # 048692;
02. The original and one copy of this application;
03. The original and one copy of personal History Form for Mr Zhang and Ms Wei;
04. The current financial statement of China & Asia Travel Service Inc.;
05. Both copies of the Memorandum of Agreement to the Airlines Reporting Corporation Agent Reporting Agreement;
06. Four mailing labels;
07. A voided check;
08. A copy of the receipt for the rental of the safe deposit box in the Far East National Bank;
09. A copy of the certificate of incorporation;
10. A copy of the Federal Taxpayer (IRS) Identification Number confirmation;
11. The irrevocable letter of credit in the full legal name of China & Asia Travel Service, Inc.;
12. Interior and exterior photographs of office location;
13. The diskette copy of application;
14. The copy of business license of city of Pasadena;

If you find any document insufficient, please contact me at 818 568 8993. Looking forward to hearing from you.

Thank you for your assistance.

With best regards,

Jianhua Zhang
President of China & Asia Travel Service, Inc.

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
DISMISS OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT ON ALL
COUNTS OF PLAINTIFF'S COMPLAINT

EXHIBIT F

OCTOBER 31, 1993

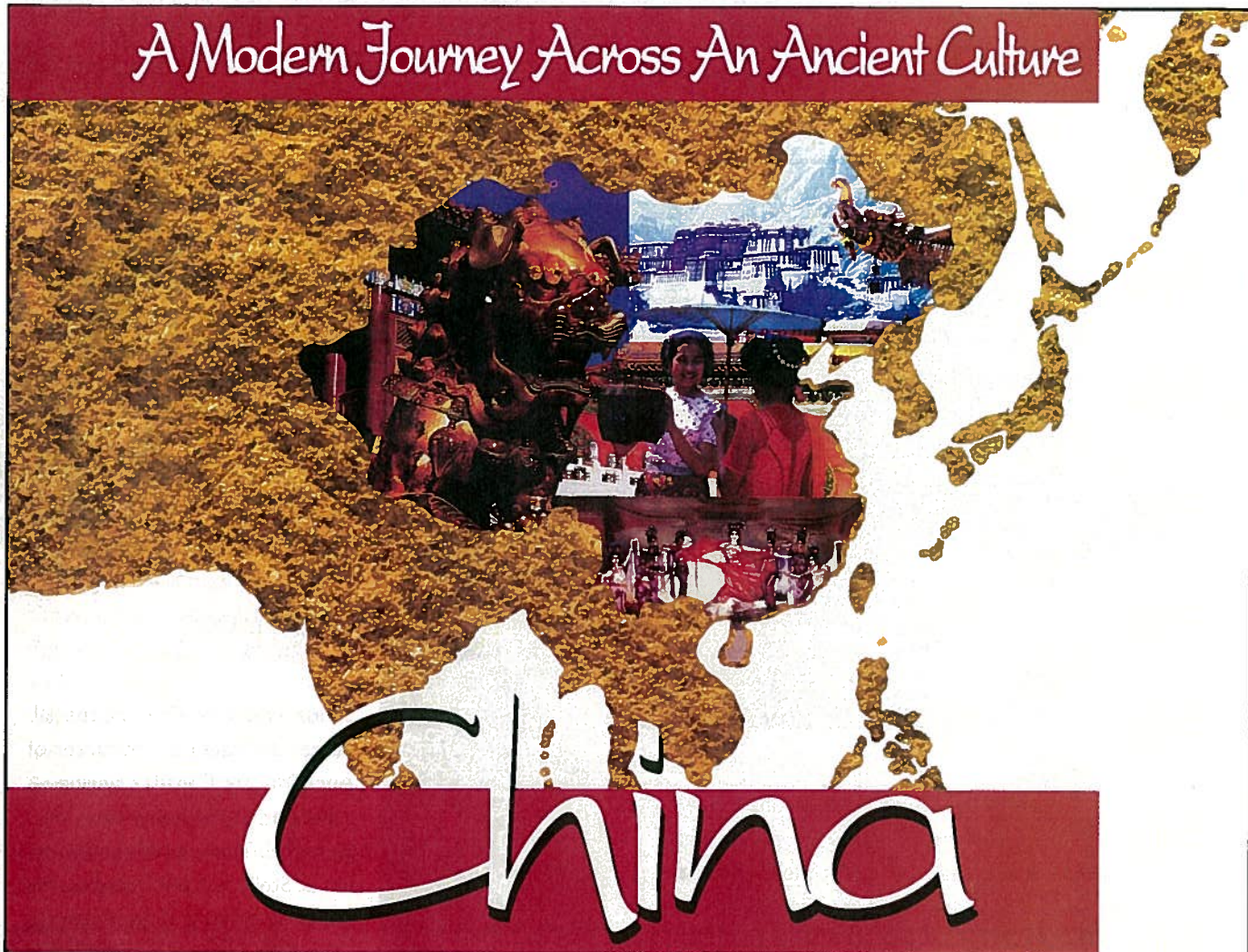


GLOBAL TRAVELER

A PACKAGE AND VACATION GUIDE



A Modern Journey Across An Ancient Culture



China's national host to the world

CITS (China International Travel Service), the largest and the most reliable Chinese travel organization, has rapidly brought China travel into the 21st century... creating an infrastructure of five-star hotels, modern transport and efficient communications... everything to satisfy a traveler's need for comfort and thirst for adventure.

Enter the forbidden city

China stands ready to be revealed. Come see it – the wonders – manmade and natural, the glory, the diversity. Beijing. Shanghai. Chengde. The Yangtze River. The Great Wall. The Terra-Cotta Warriors. The list is endless. The time to see them is now.

A friendly people

Meet China's people. Sense the energy, the tenacious grasp of the practical, their soaring spirit. But the warmth and enormous

hospitality of its people will make the deepest impression.

See it in luxury fit for emperors

The legendary splendor of Imperial China is testimony to the Chinese ability to create luxury. The Emperors are gone, but the traditions of incredible comfort in accommodation, exquisite cuisine and utterly meticulous service remain. Let us pamper you, as we carefully guide you through our world of wonders.

China International Travel Service, Head Office • 103 Fuxingmennei Avenue, Beijing 100800, China (PRC) • Tel: (01) 6012022 • Fax: (01) 6012021
China International Travel Service, U.S.A. • 975 East Green Street, Suite 101, Pasadena, Calif 91106 • Tel: 818 568 8993 • Fax: 818 568 9207

Call a USTOA tour operator for an assured journey to China!

Abercrombie & Kent
800 • 323-7308
African Travel Inc.
800 • 421-8907
American Express
800 • 241-1700

Brendan Tours
800 • 421-8446
Certified Tours, Inc.
800 • 233-7260
Collette Travel Services, Inc.
800 • 832-4656

Der Tours, Inc.
800 • 782-2424
Globus & Cosmos Tourama
800 • 221-0090
Holland American Line-Westours, Inc.
800 • 426-0327

Isram World
800 • 223-7460
Japan & Orient Tours
800 • 377-1080
Jet Vacations, Inc.
800 • 538-0999

Jetset Tours, North America, Inc.
WorldLink: 800 • 4 - JETSET
Pacific Bestours, Inc.
800 • 688-3288
Pacific Delight Tours, Inc.
800 • 221-7179

Special Expeditions, Inc.
800 • 762-0003
TBI Tours
800 • 223-0266
Visitours, Inc.
800 • 367-4368

China Intl Travel Services (USA), Inc.
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EXHIBIT G

CITS USA

626 558 9207

03/17/08 11:58am P. 002

**Airlines Reporting Corporation**

July 22, 1993

CHINA & ASIA TRAVEL SERVICE INC
DBA CHINA INTL TVL SVC USA
SUITE 101
975 E GREEN ST
PASADENA CA 91106

ATTENTION: OWNER OR MANAGER

RE: APPROVAL OF NEW AGENT

Dear Travel Agent:

I am pleased to inform you that your agency has been included on the Airlines Reporting Corporation (ARC) Agency List effective the above date. Your ARC agency code number is:

05-70997-0

Please refer to this complete number in all future correspondence to ARC. Your agency should begin reporting to Area Bank/Processing Center 6 - PXW-PHOENIX, with the sales report period ending August 1, 1993. The proceeds from sales in which ARC traffic documents are issued, minus your commissions, are the property of the carriers and are held in trust by you. ARC's first draft will be presented to your bank on August 11, 1993. Even though you may not yet have received ARC traffic documents by the time your first sales report is due, you must submit a sales report settlement authorization form and mark the "No Sales" block.

An initial supply of ARC traffic documents has been ordered, and you should receive them within approximately the next two weeks. Should you receive them prior to the Monday of your first sales period, please do not use them until that Monday. Please allow adequate time for your shipment to be processed. If a delay greater than two weeks from the date of this letter occurs, call Rand McNally, NOT ARC, at (708) 673-8660 for assistance.

Please note, ALL ATB orders must be authorized by your servicing CRS before they will be filled. Please remember also that ARC traffic documents may only be issued in the agency code number for which they are assigned. Under no circumstances may one branch's tickets be issued and identified by the home office, another branch or an STP location's agency code number, or vice versa, even if the supplies assigned to one are depleted.

ARC traffic documents are extremely valuable and are supplied to you in trust. In the event of a change in ownership, possession and use of ARC traffic documents and carrier identification plates by the new owner(s) prior to ARC approval is prohibited. Attachment B in Section 80 of the Handbook contains the security rules for these documents and also for the airline identification plates that the carriers supply to you.

Owners and qualifiers should familiarize themselves with the Industry Agents' Handbook, particularly Section 80 (ARC Agent Reporting Agreement) which sets forth the rights and obligations of an ARC approved agent. Other very useful information and instructions may be found in Section 3.6 (ticket reordering

ARC

1530 Wilson Blvd., Suite 800
Arlington, VA 22209-2448
703-816-8000 Fax: 703-816-8104

CITS USA

626 568 9207

03/17/08 11:58am P. 003

forms and procedures), Section 3.8 (ticket imprinter ordering procedures), Section 12 (preparation of sales reports and area bank/processing center addresses), Section 20 (the ARC travel agent training program), Section 30 (bond/letter of credit forms and procedures), Section 60 (applications and procedures for any changes in status of an approved agent), and Section 70.2 (tips regarding security and storage ARC traffic documents).

Please note, some carriers maintain supplemental appointment standards and processing fees and the carriers that wish to appoint your agency location will provide you with carrier validation plates directly.

The provision of free or reduced-rate transportation by a carrier to any agent and its employees is governed by whatever terms, rules and/or regulations that the carrier establishes. Eligibility requirements are determined solely by the carriers, NOT BY ARC, and all questions regarding the requirements should be directed to the individual carriers. Please refer to Section 200 of the Handbook for additional information.

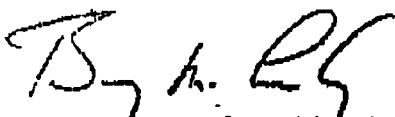
Likewise, the commission and any other compensation paid to agents by carriers depend on what each carrier and each agent agree upon privately and directly between themselves. ARC has no role in determining the amount or nature of such compensation and will not involve itself in that process or in any dispute about it.

Enclosed is your copy of the executed Memorandum of Agreement indicating the effective date of your agency's inclusion on the ARC Agency List. The text of the Agent Reporting Agreement is in Section 80 of the Handbook. This agreement may not be assigned or transferred by the agent without the approval of ARC. Also enclosed is a counter sign which must be displayed continuously in a conspicuous place at each travel agency location.

And last, we provide your agency name, address and agency code number not only to carrier participants, but to other organizations, some of which may use it for marketing purposes. If you prefer not to have your name released for such purposes, please advise ARC in writing promptly, and direct it to the attention of Data Services, (703) 816-8085.

If further assistance is needed, please refer to Section 1.2 of your Industry Agents' Handbook for the telephone number of the appropriate department.

Sincerely,



Barry M. Lemley, Director
Agency Accreditation Services

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

DECLARATION OF FRANK LI IN SUPPORT OF DEFENDANT'S MOTION TO
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EXHIBIT H

CITS USA

626 568 9207

03/17/08 11:58am P. 005



May 13, 1994

FENG LI

CHINA & ASIA TRAVEL SERVICE INC.

CHINA INTERNATIONAL TRAVELSERVICE HEADQUARTERS (U.S.A.)

975 EAST GREEN STREET

SUITE 101

PASADENA, CA 91106

IATA Code Number: 05-7 0997 0

TCIN Number: LIIF57052101

Dear Travel Agent:

We acknowledge receipt of your application or renewal order for the IATAN Travel Agent ID Card.

Due to the unprecedented demand for the card, your ID Card will reach you within 3 to 4 weeks from the date of this letter. In the meantime, to facilitate your ability to use your industry privileges, please present this letter in its original form, along with a current copy of your 1994 IATAN Agency Personnel Listing.

Your card is the key to your recognition in the industry. Show it with pride each time you travel. Welcome to the program.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Maino", followed by a horizontal line.

Mike Maino
President

This letter is valid only on original IATAN letterhead along with a copy of the 1994 IATAN Personnel List and until June 24, 1994

Operations

Suite 4060, 2000 Peel Street
Montreal, Quebec, Canada H3A 2W5
Tel. (514) 844 2877
CABLE IATA NETWORK MONTREAL
Fax (514) 844 2391

Marketing/Field Services

300 Garden City Plaza
Suite 342
Garden City, New York 11530-3302
Tel. (516) 747 4716
Fax (516) 747 4462

Mailing Address

P.O. Box 2988
Plattsburgh,
New York, 12901-0269

an IATA company
A3248-2/03/91



May 13, 1994

JIANHUA ZHANG
CHINA & ASIA TRAVEL SERVICE INC.
CHINA INTERNATIONAL TRAVELSERVICE HEADQUARTERS (U.S.A.)
975 EAST GREEN STREET
SUITE 101
PASADENA, CA 91106

IATA Code Number: 05-7 0997 0

TCIN Number: ZHAJ50050501

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Mike Maino
President

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EXHIBIT I



Robert E. Whitley, CTC
President

January 18, 1999

Frank Li, President
CHINA INTL. TRAVEL SVCE.
975 E. Green St.
Suite 101
Pasadena, CA 91106

Dear Mr. Li:

We are pleased to acknowledge receipt and approval of the application of CHINA INTL. TRAVEL SVCE. for Associate Membership in USTOA.

A Certificate of Associate Membership is enclosed, together with a USTOA logo. Instructions for the use of the logo are located right at the top of the sheet.

It is indeed a pleasure to welcome CHINA INTL. TRAVEL SVCE. to USTOA. We look forward to working with you to develop travel and preserve "Integrity in Tourism."

Sincerely,

Robert E. Whitley
President

REW:sp
Enclosure

CITS USA

626 688 9207

03/17/08 11:58am P. 006

UNITED STATES TOUR OPERATORS ASSOCIATION

A NON-PROFIT CORPORATION



THIS TO CERTIFY THAT

CHINA INTL. TRAVEL SVCE.

has been elected and enrolled as an

ASSOCIATE MEMBER

of

UNITED STATES TOUR OPERATORS ASSOCIATION

established to promote and encourage professional,
financial and ethical integrity in tourismBy Authority of the Board of Directors, entered the 18th day of January 1999
President

China Intl Travel Services (USA), Inc.
v.
China & Asia Travel Service, Inc, et al.
Case No. 08-cv-01293

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EXHIBIT J

中華人民共和國駐美國洛杉磯總領事館**Consulate General of The People's Republic of China**

501 Shatto Place, Suite 300 Los Angeles, CA 90020

Sir/Madam,

Effective May 1, 1993, this Consulate General will not accept application of visa, passport, authentication and notarization by mail. If the applicants are not able to come in person, they may apply through local travel service or law offices in Los Angeles, or through the Subsidiaries of China International Travel Service (CITS) or China Travel Service (CTS). Their addresses and phone Nos. are:

- 1) China & Asia Travel Service, Inc.
975 East Green St., Suite 101,
Pasadena, CA 91106
Tel: (818) 568-8993
(818) 568-8997 Fax: (818) 568-9207
- 2) U.S. China Travel Service, Inc.
119 S Atlantic Blvd., Suite 303,
Monterey Park, CA 91754
Tel: (818) 457-8668 Fax: (818) 457-8955

THANK YOU FOR YOUR COOPERATION. ANY FURTHER APPLICATION BY MAIL WILL NOT BE ACCEPTED & WILL BE RETURNED.

Visa Office

中華人民共和國駐美國洛杉磯總領事館**Consulate General of The People's Republic of China**

501 Shatto Place, Suite 300 Los Angeles, CA 90020

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Monterey Park, CA 91754
Tel: (818) 457-8668 Fax: (818) 457-8955

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Visa Office